

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

09 OCT 14 P2:53

UNITED STATES OF AMERICA,

Plaintiff,

JON W. SANCHEZ
CLERK

v.

VIKKI JOHNSON,

Defendant.

09 CR-250

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES:

1. Beginning sometime in 2006, and continuing until on or about October 23, 2008, in the State and Eastern District of Wisconsin,

VIKKI JOHNSON

managed and controlled a place as the owner and occupant.

2. The place was the residence located at 169 E. Willow Road, Fox Point, WI.

3. The defendant knowingly and intentionally made the place available for use, with and without compensation, for the purpose of unlawfully storing a mixture and substance containing marijuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 856(a)(2).

COUNT TWO

THE GRAND JURY FURTHER CHARGES:

Beginning sometime in 2006, and continuing until on or about October 23, 2008, in the State and Eastern District of Wisconsin and elsewhere,

VIKKI JOHNSON,

having knowledge of the actual commission of a felony cognizable by a court of the United States, to wit, conspiracy to possess with the intent to distribute and distribute marijuana, a Schedule I controlled substance, concealed and did not as soon as possible make known the same to some judge or other person in civil or military authority under the United States.

All in violation of Title 18, United States Code, Section 4.

FORFEITURE NOTICE

1. 1. The allegations contained in Counts One and Two of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.

2. Upon conviction of the offenses as alleged in Counts One or Two as set forth in this Indictment, the defendant, shall forfeit to the United States of America, pursuant to Title 21, United States Code, Section 853, any property, real or personal, which constitutes or is derived from proceeds traceable to the offense. The property to be forfeited includes, but is not limited to, the following:

A. A personal money judgment against each defendant in the amount of \$1,000,000.00, an amount representing the unseized proceeds of the violation charged in Count One, and funds used to facilitate the violations;

B. The residence located at 169 E. Willow Road, Fox Point, WI.

3. If any of the property described above, as a result of any act or omission of the defendants:

A. cannot be located upon the exercise of due diligence;

B. has been transferred or sold to, or deposited with, a third party;

C. has been placed beyond the jurisdiction of the court;

D. has been substantially diminished in value; or

E. has been commingled with other property which cannot be divided without difficulty,

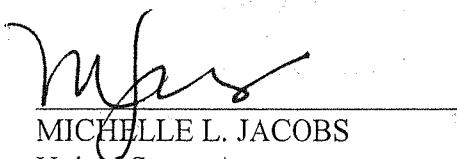
the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

All pursuant to 21 U.S.C. § 853.

A TRUE BILL:


FOREPERSON

Date: 10/14/09


MICHELLE L. JACOBS

United States Attorney